

Section V

SDWIS Reporting and SNC Definitions

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5.1 Safe Drinking Water Information System (SDWIS) Reporting Under the LT1ESWTR

SDWIS/FED (Safe Drinking Water Information System/Federal version) is an EPA national database storing routine information about the nation's drinking water. Designed to replace the system known as FRDS (Federal Reporting Data System), SDWIS/FED stores the information EPA needs to monitor approximately 175,000 public water systems.

States supervise the drinking water systems within their jurisdictions to ensure that each public water system meets State and EPA standards for safe drinking water. The Safe Drinking Water Act (SDWA) requires States to report drinking water information periodically to EPA. This information is maintained in SDWIS/FED.

States report the following information to EPA:

- Basic information on each water system, including: name, ID number, number of people served, type of system (year-round or seasonal), and source of water (ground water or surface water);
- Violation information for each water system: whether it has followed established monitoring and reporting schedules, complied with mandated treatment techniques, or violated any Maximum Contaminant Levels (MCLs);
- Enforcement information: what actions States have taken to ensure that drinking water systems return to compliance if they are in violation of a drinking water regulation; and
- Sampling results for unregulated contaminants and for regulated contaminants when the monitoring results exceed the MCL.

EPA uses this information to determine if and when it needs to take action against non-compliant systems, oversee State drinking water programs, track contaminant levels, respond to public inquiries, and prepare national reports. EPA also uses this information to evaluate the effectiveness of its programs and regulations, and to determine whether new regulations are needed to further protect public health.

5.1.1 Federally Reported Violations

Under SDWIS/FED reporting, States only report when violations occur. In the interest of reducing the reporting burden on States, EPA has limited the number and type of violations to be reported to SDWIS/FED. However, PWSs must still keep records and report all required information to the State. Any violation of the rule, whether included in the accompanying table or not, is a basis for a State or federal enforcement action.

Table 5.1 summarizes the violation and contaminant codes that will be used to report violations of the LT1ESWTR to SDWIS/FED.

Table 5.1: SDWIS/FED Codes for Federal Reporting Under the LT1ESWTR

Violation Code	Contaminant Code	Treatment Technique (TT) Violations
37	0300	Failure to profile or consult w/State (disinfection changes)
43	0300	Combined filter effluent exceeds 1 NTU/State-set maximum requirements
44	0300	More than 5 percent of monthly combined filter effluent samples exceed 0.3 NTU/State-set maximum requirements
47	0300	Construction of an uncovered finished water storage facility
<i>Inventory Code</i>	0300	Failure to meet <i>Cryptosporidium</i> site specific conditions (unfiltered systems)
		Monitoring and Reporting (M/R) Violations
29	0300	Major: Failure to conduct follow-up activities triggered by individual filter turbidity exceedances.
38 ¹	0300	Major: Failure to collect and report 90 percent of required combined filter effluent turbidity samples
		Major: Failure to report all individual filter monitoring has been conducted
		Minor: Any other failure to monitor or report
		Recordkeeping Violations
09	0300	Failure to maintain the results of individual filter monitoring for at least 3 years
		Public Notification (PN) Violation
06	0300	Failure to notify public after a violation

¹ Flag used to denote major or minor

Table 5.2 contains the Federally reportable violations for the LT1ESWTR in more detail. These violations are listed by contaminant or requirement and violation type. The table includes the SDWIS/FED reporting codes, the regulatory citation, system type affected, a detailed description of the violation, and the initial compliance date. This table will allow a user to better understand violations listed in SDWIS. For more information on how to report LT1ESWTR violations to SDWIS, please refer to the Appendix E *[Under Development]*.

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Table 5.2: Federal Reporting for LT1ESWTR

Treatment Technique Violation						
SDWIS Reporting Code	Regulated Contaminant/ Requirement	Citation	Violation Type	System Size and Type Affected	Violation	Initial Compliance Date
1	2	3	4	5	6	7
37/0300	Disinfection and Consultation	§141.530, §141.536, §141.540, and §141.542	TT	CWS and NTNC Subpart H systems serving fewer than 10,000 people	Failure to profile or consult with the State before making a significant change to a disinfection practice if required to develop a disinfection profile	July 1, 2003 (systems serving 500-9,999) January 1, 2004 (systems serving fewer than 500)
43/0300	Filtration	§141.551 (b)	TT	Subpart H systems serving fewer than 10,000 using conventional or direct filtration Subpart H systems serving fewer than 10,000 using alternative filtration technologies	Failure to achieve combined filter effluent turbidity level that at no time exceeds 1 NTU if PWS uses conventional or direct filtration or exceedance of the State-set maximum turbidity performance requirements for systems using alternative filtration technologies	January 14, 2005

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Treatment Technique Violation						
SDWIS Reporting Code	Regulated Contaminant/ Requirement	Citation	Violation Type	System Size and Type Affected	Violation	Initial Compliance Date
1	2	3	4	5	6	7
44/0300	Filtration	§141.551(a)	TT	Subpart H systems serving fewer than 10,000 using conventional or direct filtration Subpart H systems serving fewer than 10,000 using alternative filtration technologies	Failure to achieve combined filter effluent turbidity level of 0.3 NTU in 95 percent of monthly measurements if PWS uses conventional or direct filtration or failure to meet the State-set turbidity performance requirements in 95 percent of monthly measurements for systems using alternative filtration technologies	January 14, 2005
47/0300	Finished Water Reservoirs	§141.510 and §141.511	TT	All Subpart H systems serving fewer than 10,000 people	Systems are not allowed to begin construction of any uncovered finished water reservoir (reservoir, holding tank, or other storage facility)	March 15, 2002
Inventory Code/0300	<i>Cryptosporidium</i>	§141.520 and §141.521	TT	All unfiltered Subpart H systems serving fewer than 10,000 people	Failure to meet <i>Cryptosporidium</i> site specific condition requirements - system must install filtration within 18 months. Do not report a violation, but change the inventory record/code from “unfiltered avoiding” to “unfiltered required to filter”. Report a 42 code violation if filtration has not been installed after 18 months.	January 14, 2005

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Monitoring and Reporting Violations						
SDWIS Reporting Code	Regulated Contaminant/ Requirement	Citation	Violation Type	System Size and Type Affected	Violation	Initial Compliance Date
1	2	3	4	5	6	7
29/0300	Filtration - Response to Individual Filter Trigger	§141.563(a)	M/R Major	Subpart H systems serving fewer than 10,000 using conventional or direct filtration	Failure to report to the State by the 10 th of the month following a turbidity exceedance (> 1.0 NTU in 2 consecutive recordings taken 15 minutes apart)	January 14, 2005
29/0300	Filtration - Response to Individual Filter Trigger	§141.563(b)	M/R Major	Subpart H systems serving fewer than 10,000 using conventional or direct filtration	Failure to conduct and/or report to the State a self-assessment of an individual filter within 14 days of a turbidity exceedance (> 1.0 NTU in 2 consecutive recordings taken 15 minutes apart in each of 3 consecutive months)	January 14, 2005
29/0300	Filtration - Response to Individual Filter Trigger	§141.563(c)	M/R Major	Subpart H systems serving fewer than 10,000 using conventional or direct filtration	Failure to have a comprehensive performance evaluation conducted by the State or a third party no later than 60 days after a turbidity exceedance (> 2.0 NTU in 2 consecutive recordings taken 15 minutes apart in 2 consecutive months) and have the evaluation completed and submitted to the State no later than 120 days following the exceedance	January 14, 2005

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Monitoring and Reporting Violations						
SDWIS Reporting Code	Regulated Contaminant/ Requirement	Citation	Violation Type	System Size and Type Affected	Violation	Initial Compliance Date
1	2	3	4	5	6	7
38/0300	Filtration/ combined filter effluent	§141.570(a)	M/R Major Failure to collect and report at least 90 percent of required samples.	Subpart H systems serving fewer than 10,000 using conventional, direct, or alternative filtration	Failure to sample combined filter effluent for turbidity at required frequency using required collection and analytical methods and report the following within 10 days after the end of each month the PWS serves water to the public: 1. total number of samples taken, the number and percentage of samples less than or equal to the limits specified in §141.73 or §141.173; and/or 2. date and level of any measurements over 1 NTU for conventional or direct filtration or which exceed the maximum level set by the State for alternative filtration technologies	January 14, 2005
			M/R Minor Any other failure to monitor or report.			
38/0300	Filtration	§141.570(b)	M/R Major	Subpart H systems serving fewer than 10,000 using conventional or direct filtration	Failure to report that the system has conducted all individual filter monitoring to the State within 10 days after the end of each month	January 14, 2005

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Recordkeeping Violations						
SDWIS Reporting Code	Regulated Contaminant/ Requirement	Citation	Violation Type	System Size and Type Affected	Violation	Initial Compliance Date
1	2	3	4	5	6	7
09/0300	Filtration	§141.571(a)	Record-keeping	Subpart H systems serving fewer than 10,000 using conventional or direct filtration	Failure to maintain the results of individual filter monitoring for at least 3 years, documenting that the system has collected and recorded individual filter results every 15 minutes	January 14, 2005

Public Notification Violations						
SDWIS Reporting Code	Regulated Contaminant/ Requirement	Citation	Violation Type	System Size and Type Affected	Violation	Initial Compliance Date
1	2	3	4	5	6	7
06/0300	Filtration and Disinfection	§141.202 and 203	PN	All Subpart H serving fewer than 10,000 people	Failure to notify public and use approved public notification language when there is a violation of the treatment technique and/or monitoring requirements for filtration and disinfection in Subpart H or Subpart T	January 14, 2005

5.2 LT1ESWTR - SNC Definition

Draft SNC Definitions for the LT1ESWTR

Significant non-compliers (SNCs) are community, non-transient non-community and transient non-community water systems that have more serious, frequent, or persistent violations. The criteria which designate a system as a SNC vary by contaminant. Once a system is designated as a SNC, it is subject to EPA's timely and appropriate policy. SNCs that have not returned to compliance or are not addressed timely and appropriately are called Exceptions. Timeliness for SNCs is eight months after the system became a SNC. (Two months for the State to determine, and become aware of, the system's SNC status and six months in which to complete the follow-up/enforcement action). The types of actions considered appropriate include the issuance of a formal state or federal administrative or compliance order, a civil or criminal referral to the State's Attorney General or Department of Justice, or a state bilateral compliance agreement signed by both the State and the violator. The following are SNC definitions for the LT1ESWTR.

NOTE: SNC definitions for the Surface Water Treatment Rule continue to remain in effect.

UNFILTERED AVOIDING FILTRATION

- Systems which fail avoidance criteria must filter. See 6/27/90 Surface Water Treatment Rule Implementation Manual. Systems become an SNC if filtration is not installed within 18 months of any failure of the avoidance criteria.
- A system that has three (3) or more Major M/R violations in any 12 consecutive months.
- A system that has a combination of five (5) or more Major M/R violations and Minor M/R violations in any 12 consecutive months.

FILTERED

- A system that has four (4) or more TT violations in any 12 consecutive months.
- A system that has a combination of six (6) or more TT violations and Major M/R violations in any 12 consecutive months.
- A system that has a combination of ten (10) or more TT violations, Major M/R violations, and Minor M/R violations in any 12 consecutive months.

DISINFECTION PROFILING (if required)

- Failure to consult with the state before making a significant disinfection change if required to develop a disinfection profile.

UNCOVERED RESERVOIRS

- Beginning construction of any uncovered finished water reservoir on or after March 15, 2002.

5.3 LT1ESWTR Reporting Guidance Manual

EPA is developing a reporting guidance manual for the LT1ESWTR. This manual will include examples and instruction on determining proper violations and violation codes for the requirements of the LT1ESWTR and will be included in Appendix E.

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